

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

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Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12528 (MBK)

APPLICATION FOR PRO HAC VICE ADMISSION OF DAVID C. FREDERICK, ESQ.

Pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules for the United States Bankruptcy Court for the District of New Jersey, the undersigned hereby seeks entry of an Order granting the admission *pro hac vice* of David C. Frederick, Esq. of the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., to represent Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain personal injury claimants represented by Arnold & Itkin (the “Arnold & Itkin Plaintiffs”) before this Court in connection with the above-captioned chapter 11 case.

In support of this Application, the undersigned submits the attached Certification of David C. Frederick, Esq. and requests that the proposed form of order submitted herewith be

entered. The undersigned certifies that he is admitted, practicing and a member in good standing with the Bar of the State of New Jersey and is admitted to practice before the United States District Court for the District of New Jersey.

Dated: September 21, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Colin R. Robinson (NJ Bar No. 025352001)

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**CERTIFICATION OF DAVID C. FREDERICK, ESQ. IN SUPPORT OF APPLICATION
FOR ORDER FOR ADMISSION PRO HAC VICE**

I, David C. Frederick, Esq. hereby certify and states as follows:

1. I am an attorney with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. I maintain my regular office for practice of law at 1615 M Street, N.W., Suite 400, Washington, D.C. 20036.

2. I am a member in good standing of the bar of District of Columbia (admitted in 1992) and the bar of the Commonwealth of Pennsylvania (admitted in 1989) and am duly licensed and admitted to practice in the Supreme Court of the United States, the United States Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth,

Tenth, Eleventh, District of Columbia, and Federal Circuits, and the United States District Court for the District of Columbia.

3. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

4. I submit this Certification in support of the application to permit me to appear and participate, *pro hac vice*, as counsel to Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain personal injury claimants represented by Arnold & Itkin (the “Arnold & Itkin Plaintiffs”) in this proceeding as I have particularized knowledge of the facts and circumstances relating to this case.

5. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers Fund for Client Protection in accordance with the New Jersey Court Rule 1:28 and shall immediately comply with the requirement upon my admission *pro hac vice*.

6. I will abide by D.N.J. L.R. 101.1(c).

7. I have familiarized myself with the Local Rules of Bankruptcy Procedure promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of this case.

8. I understand that, upon admission *pro hac vice*, I am within the disciplinary jurisdiction of this Court and agree to notify the Court immediately of any matter affecting my standing at the bars of any other court.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ David C. Frederick

David C. Frederick

**KELLOGG, HANSEN, TODD, FIGEL &
FREDERICK, P.L.L.C.**

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ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is hereby **ORDERED**.

This matter having been brought before the Court on application for an Order for Admission *Pro Hac Vice*; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed. R. Civ. Proc. 78, D.N.J. L. Civ. R. 101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that David C. Frederick, Esq. be permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L. Civ. R. 101.1(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders; and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order; and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address, for forwarding by the Clerk to the District Court:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attention: Pro Hac Vice Admissions;

and it is further **ORDERED** that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.